

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Bit Digital, Inc. Securities Litigation

Case No.: 1:21-cv-00515-ALC

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**STIPULATION AND [PROPOSED] ORDER REGARDING CASE SCHEDULE**

WHEREAS, Lead Plaintiff Joseph Franklin Monkam Nitcheu and Defendants Bit Digital, Inc., Min Hu, and Erke Huang (collectively, “Defendants”), by and through their counsel, hereby stipulate as follows:

WHEREAS, on March 8, 2021, the Court entered an order (ECF No. 6) granting the parties’ stipulation regarding Defendants’ time to respond to the complaint, ordering that “[a]fter the Court has appointed Lead Plaintiff and Lead Counsel for the putative Class, counsel for Defendants will confer with the court-appointed Lead Counsel to establish a schedule with respect to filing an amended complaint or a consolidated amended complaint, and any responsive pleadings or motions, and will jointly submit the same to the Court”;

WHEREAS, on April 29, 2021, the Court appointed Mr. Nitcheu as Lead Plaintiff and Block & Leviton LLP as Lead Counsel (ECF No. 21);

WHEREAS, in its April 29, 2021 Order, the Court ordered that the “parties shall file a joint status report proposing a schedule with respect to filing of an amended complaint or a consolidated amended complaint, and any responsive pleadings or motions by no later than May 7, 2021”; and

WHEREAS, counsel for Lead Plaintiff and Defendants have now conferred and agreed upon a schedule;

IT IS HEREBY STIPULATED AND AGREED, and respectfully requested among the parties, through their undersigned counsel, that the Court order:

1. Lead Plaintiff shall file an Amended Complaint within 60 days of the entry of this Stipulation by the Court;
2. Defendants shall answer or otherwise respond to the Amended Complaint 60 days after it is filed;
3. Should Defendants move to dismiss the Amended Complaint, Lead Plaintiff's opposition shall be due 30 days after the filing of Defendants' motion; and
4. Defendants' reply, if applicable, shall be filed 30 days following Lead Plaintiff's opposition.

Dated: New York, New York  
May 6, 2021

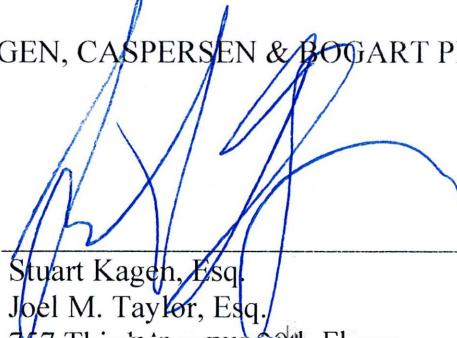
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*Attorneys for Defendants*

So Ordered on this \_\_\_\_ day of \_\_\_\_\_ 2021:

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Hon. Andrew L. Carter, Jr.  
United States District Court Judge